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Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TWB204
Washington, D.C. 20554

Re: **MM Docket No. 00-97**
RM-9865

Dear Ms. Salas:

Transmitted herewith, on behalf of Capital Television Corporation, are an original and four copies of the Comments of Capital Television Corporation in the above-captioned docket.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with the undersigned.

Very truly yours,

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.


Coe W. Ramsey
Counsel to Capital Television Corporation

CWR/slm
Enclosures

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List A B C D E

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment of Section 73.622(b),) MM Docket No. 00-97
Table of Allotments,) RM-9865
Digital Television Broadcast Stations,)
(Richmond, Virginia))
)
)

**COMMENTS OF
CAPITAL TELEVISION CORPORATION**

Pursuant to Section 1.415 of the Commission's rules, Capital Television Corporation ("Capital Television"), permittee of Low-Power Television Station W42CH, Richmond, Virginia, by its counsel, hereby files the instant comments in response to the above captioned proposal of Central Virginia Educational Telecommunications Corporation ("CVETC"), licensee of noncommercial television station WCVE-TV, Richmond, Virginia, to substitute DTV Channel 42 for its assigned DTV Channel 24.

As permittee of W42CH, Richmond, Virginia, Capital Television has construction permit authority for a low-power television station on Channel 42 in Richmond, Virginia. See FCC File No. BPTTL-19980811JF. If the Commission were to grant CVETC's request to substitute DTV Channel 42 for its assigned DTV Channel 24, CVETC's television station would displace W42CH.

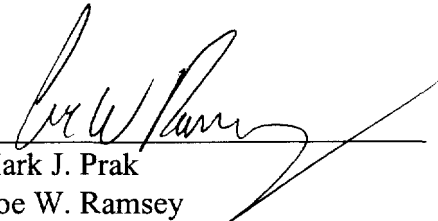
Capital Television recognizes that in developing the DTV channels, the Commission maintained the secondary status of low-power television stations. See *Advanced Television Systems*

and Their Impact upon the Existing Television Broadcast Service, Sixth Report & Order, FCC 97-115, MM Docket No. 87-268, ¶¶ 141-143 (Rel. Apr. 21, 1997); Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order, FCC 98-24, MM Docket No. 87-268, ¶ 105 (Rel. Feb. 23, 1998). Accordingly, to preserve W42CH in light of the instant rulemaking proceeding, Capital Television has filed an application for low-power displacement relief to operate on Channel 59. Provided the Commission grants such relief, Capital Television does not object to CVETC's DTV reallocation request.

Respectfully submitted,

CAPITAL TELEVISION CORPORATION

By:


Mark J. Prak
Coe W. Ramsey

Counsel to Capital Television Corporation

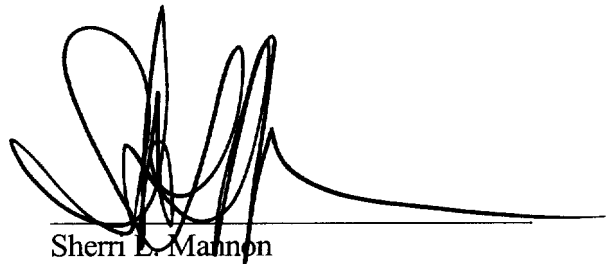
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July 6, 2000

CERTIFICATE OF SERVICE

This is to certify that I have this the 6th day of July, 2000, served a copy of the foregoing **COMMENTS OF CAPITAL TELEVISION CORPORATION** upon the parties in this action by depositing a copy of the same in the United States mail in a postpaid envelope addressed as follows:

Richard J. Bodorff,
E. Joseph Knoll III
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006
(Counsel for Central Virginia Educational Telecommunications Corporation)



Sherri E. Mannon